

Robert A. Julian (SBN 88469)  
Cecily A. Dumas (SBN 111449)  
BAKER & HOSTETLER LLP  
600 Montgomery Street, Suite 3100  
San Francisco, CA 94111-2806  
Telephone: 415.659.2600  
Facsimile: 415.659.2601  
Email: rjulian@bakerlaw.com  
Email: cdumas@bakerlaw.com

Eric E. Sagerman (SBN 155496)  
David J. Richardson (SBN 168592)  
Lauren T. Attard (SBN 320898)  
BAKER & HOSTETLER LLP  
11601 Wilshire Blvd., Suite 1400  
Los Angeles, CA 90025-0509  
Telephone: 310.820.8800  
Facsimile: 310.820.8859  
Email: esagerman@bakerlaw.com  
Email: drichardson@bakerlaw.com  
Email: lattard@bakerlaw.com

*Counsel to the Official Committee of Tort Claimants*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**In re:**

**PG&E CORPORATION**

**-and-**

**PACIFIC GAS AND ELECTRIC  
COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

*\*All papers shall be filed in the Lead Case,  
No. 19-30088 (DM)*

Bankruptcy Case  
No. 19-30088 (DM)

Chapter 11  
(Lead Case)  
(Jointly Administered)

**DECLARATION OF DAVID J.  
RICHARDSON IN SUPPORT OF THE  
OFFICIAL COMMITTEE OF TORT  
CLAIMANTS' MOTION TO  
ESTABLISH PROCEDURES FOR  
DISCOVERY PRECEDING PLAN  
CONFIRMATION**

**Hearing**

**Date: March 10, 2020**  
**Time: 10:00 a.m. (Pacific Time)**  
**Place: Courtroom 17**  
**450 Golden Gate Ave., 16<sup>th</sup> Fl.**  
**San Francisco, CA 94102**

1 I, David J. Richardson, hereby declare:

2 1. I am a member in good standing of the bar of California and I am admitted to practice  
3 in the United States Bankruptcy Court in the Northern District of California. I am counsel in the  
4 Los Angeles, California office of Baker Hostetler LLP, attorneys of record for The Official  
5 Committee of Tort Claimants (the "TCC"). I have personal knowledge of the facts stated herein  
6 and I could and would competently and truthfully testify to those facts if called as witness.

7 2. The TCC issued subpoenas to approximately 106 Vendors in January and February  
8 of 2020. The subpoenas requested contracts covering the Vendors' work for PG&E and documents  
9 that would identify certain indemnification agreements between Vendors and PG&E, as well as  
10 information about the Vendors' insurance coverage for the work carried out for PG&E.

11 3. I understand that to date, I or my colleagues who are also counsel for the TCC have  
12 collectively communicated with over 75 subpoena recipients.

13 4. The TCC has agreed to extend the subpoena response time for over 35 Vendors who  
14 expressed a need.

15 5. In some instances, the TCC has agreed to narrow the scope of the subpoena for  
16 certain Vendors. In other instances, the TCC has agreed to withdraw the subpoena.

17 6. Despite our efforts to resolve all issues pertaining to the scope and timing of the  
18 subpoenas, the TCC has received approximately 31 objections from Vendors, and I believe that a  
19 procedure to facilitate a streamlined approach for resolution of these and other future objections  
20 would be in the best interests of all parties and this Court.

21 I declare under the penalty of perjury under the laws of the United States that the  
22 foregoing is true and correct and that this declaration was executed on the 19th day of February,  
23 2020, in San Francisco, California.

24  
25 /s/ David J. Richardson  
26 David J. Richardson  
27  
28